### ROCK CREEK PARK

WIRELESS TELECOMMUNICATIONS FACILITIES (TWO MONOPOLES WITH INFRASTRUCTURE)
Maintenance Yard and Fitzgerald Tennis Center
Glover Road and 16<sup>th</sup> Street and Morrow Drive, NW

Report to the National Park Service

November 4, 1999

#### Abstract

The National Park Service has submitted a proposal for wireless telecommunications facilities (two monopoles and infrastructure) in Rock Creek Park at the Fitzgerald Tennis Center and the Maintenance Yard. These facilities will provide increased coverage and capacity for Bell Atlantic Mobile within Rock Creek Park, generally south of Military Road. On April 8, 1999 the Commission disapproved this project, requesting that the National Park Service provide more information regarding park safety issues and a comprehensive study to assess the impact of reasonably anticipated wireless telecommunications facilities on the views and natural and historic elements of the park.

## **Authority**

D.C. Code, sec. 5-432, and Section 5 of the National Capital Planning Act of 1952, as amended (40 U.S.C. 71(e)).

### **Commission Action**

### The Commission:

- **Takes responsibility** for the scope and content of the environmental assessment dated April 1999, submitted by the National Park Service.
- Approves the preliminary and final site and building plans for wireless telecommunications
  facilities (two monopoles with infrastructure) in Rock Creek Park, at the Maintenance Yard

and at the Fitzgerald Tennis Center, Glover Road and 16<sup>th</sup> Street and Morrow Drive, NW, as shown on NCPC Map File No. 03.70(38.00)-40618, for a period not to exceed five years.

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### BACKGROUND AND STAFF EVALUATION

#### DESCRIPTION OF PROPOSAL

The National Park Service (NPS) has submitted preliminary and final site and building plans for the Bell Atlantic Mobile installation of two monopoles, each with an antenna array of 9 panel antennas, to be located in Rock Creek Park. Each panel antenna will be 53 inches by 14 inches, mounted in a candelabra design. Additionally, an ancillary maintenance structure will be provided at each monopole site. One monopole would be located at the Fitzgerald Tennis Center (FTC) and the other would be located at the Maintenance Yard.

BAM submitted this proposal to NPS in accordance with President Clinton's Executive Memorandum of August 10, 1995. This memorandum directs federal agencies to facilitate the siting of wireless telecommunications facilities on federal property. The General Services Administration's implementation guidelines call for federal departments and agencies to take steps to assure that they fully support the siting of commercial antennas on federal property, as long as the placement of these antennas does not directly conflict with the agency's mission.

## Tennis Center Site

The FTC is bounded by Morrow Drive on the north, the Carter Baron Amphitheater parking lot and a wooded area on the south, 16<sup>th</sup> Street on the east, and Picnic Grove # 23 on the west. The center consists of a 7,500-seat stadium and 25 practice courts. Approximately 90,000 people use the practice courts annually. The center shares a large parking lot with the Carter Baron Amphitheater. Other features of this site include recreational fields on the north, deciduous hardwood forest surrounding the west and south sides, and a residential neighborhood across 16<sup>th</sup> Street.

The stadium has four 100-foot light poles and numerous 38- and 50-foot light poles that provide illumination for the tennis activity at this site.

# Tennis Center Site Program

• The proposal provides for a new 100-foot monopole to replace the existing 38-foot light pole on the southwest corner of the southern practice courts. The existing court lights would be remounted at the 38-foot level and the cellular antenna array with 9 panel antennas would be mounted at the 100-foot level.

- The monopole and antenna will be painted to match the existing stadium poles and lights. The candelabra design antenna array of 9 panel antennas would be approximately 15 feet above the tree line.
- The ancillary equipment shed is a 12-foot by 30-foot structure, 9 feet high, located in the notch of the adjacent box office building. This structure will be painted to match the existing building so that it will appear to be the same building. Access to this structure will be via a new 4-foot-wide concrete sidewalk from the existing parking area.

## Maintenance Yard Site

The Maintenance Yard is the sole facility that provides maintenance for the park. This 30-acre complex is bounded by Military Road on the north, Ross Drive on the south and east, and Glover Road on the west. The complex includes one-story garages and sheds for storage of maintenance equipment, a 50-car parking lot, park offices, and storage space for topsoil, sand, trail surfacing material, stone, and other building materials.

This complex is located on a hilltop within an upland deciduous hardwood forest on the west side of Rock Creek Park. It is divided into an upper and lower terrace area, with a 30-foot height difference between the two areas.

# Maintenance Yard Site Program

- The proposal provides for a new 130-foot monopole to be placed within the trees near the maintenance yard entrance at the upper terrace. It will be sited in an area designated as Alternative #2 of the alternatives proposed by NPS for this area.
- The candelabra design antenna array of 9 panel antennas will be mounted at the 130-foot height.
- This monopole will also have a 12-foot by 30-foot, 9-foot-high ancillary shed for equipment.
- Maintenance access to the monopole and equipment shed will not require entering the maintenance yard, which is a secure area.

# Site Design Concept

• The primary site design concept for the placement of both antenna poles and ancillary equipment sheds is to place these elements within existing developed areas within the park without adversely impacting the activity on each site.

- Placement of these elements at the FTC site is focused on putting them at the edge of a
  wooded area in the same location as an existing light pole. Additionally, the monopole and
  shed will be painted to blend in with the other light poles and small buildings located in the
  area.
- Placement of these elements at the maintenance yard is focused on placing them at a site that is high enough to provide necessary coverage while minimizing the visual impact on the park.

### PREVIOUS COMMISSION ACTION

On April 8, 1999, the Commission disapproved the preliminary and final site and building plans for the proposed wireless telecommunication facilities (two monoploes with infrastructure) in Rock Creek Park as shown on NCPC Map File No. 03.70(38.00)-40618, until the National Park Service undertakes:

- A study that verifies the need for additional safety measures in Rock Creek Park and presents alternative solutions if such safety measures are needed.
- A comprehensive study to assess the impact of all reasonably anticipated wireless telecommunication carriers' facilities on the views and natural and historic elements of the park; and a finding has been made that such impacts, if any, are acceptable to the National Park Service and to the Commission.

### RESPONSE TO COMMISSION ACTION

NPS submitted a Statement Regarding the Bell Atlantic Mobile Applications to Establish Telecommunications Facilities Within Rock Creek Park (Statement). After consultation with staff, NPS submitted a letter on June 22, 1999 to more directly respond to the Commission's specific requests. (The letter is attached to his report.)

The letter states that the U.S. Park Police employ a wide variety of methods of ensuring visitor safety in the park, including foot, bicycle, motorcycle, horse-mounted, and vehicular patrols, undercover surveillance, drug enforcement, and public education. However, over the last several years, the public has come to depend on wireless phone service to routinely notify police, fire, and emergency medical services of the need for assistance. NPS believes that enhanced wireless communication within the park will permit the 2 million annual visitors and the 12 million annual commuters enhanced ability to initiate calls to emergency law enforcement and public safety services thereby increasing safety within the park.

The Statement submitted on June 3, 1999 briefly discusses alternatives to wireless communication facilities. Wireless communication services that rely on satellites rather than antennas (and monopoles or towers) are thought to be impractical at this time. Wireless

communication services that use fiberoptic or coaxial cables would cause greater disturbance to park resources, and would require antennas spaced every one-quarter mile along all of the roadways. Even then, the coverage would only be along the roads, and not to the interior sections of the park.

In Response to the Commission's request for a comprehensive study of all reasonably anticipated wireless communication facilities, the Statement says that the two facilities proposed by BAM are the only reasonably anticipated facilities known to NPS.

However, in an effort to alleviate the Commission's concerns regarding the potential proliferation of wireless communication facilities in the park, NPS has stated its policy for implementing the Telecommunications Act of 1996, which directs federal agencies to make property available for the siting of wireless telecommunication facilities "absent unavoidable direct conflict with the ... agency's mission, or the current or planned use of the property." The NPS policy requires compliance with the National Environmental Policy Act (NEPA), the National Historic Preservation Act (NHPA) and other statutes applicable to parkland. In addition, NPS must make a determination that the proposed facility will cause "no derogation" of park resources.

In the letter dated June 22, NPS states its policy regarding the evaluation of future applications. As a result of the analysis of the Bell Atlantic Mobile applications, NPS determined the site characteristics that minimize or eliminate impacts on the views and natural and historic elements of Rock Creek Park. These include:

- The disturbed nature of the site.
- Minimal or no visibility form key viewsheds.
- The absence of important natural or historic resources.
- The availability of utilities and existing access roads.
- The potential for co-location of future antennas.

NPS believes that there is only one currently known site in the park, in addition to the tennis center and the maintenance yard, where these characteristics exist, and where the topographical elevation is high enough to potentially allow wireless communication coverage to the valley floor. That site is the Oregon Avenue Park Police Station.

Any application to use this site, or any other site in the park including co-location on the currently proposed Bell Atlantic Mobile facilities, would be analyzed according to the NPS policy implementing the Telecommunications Act of 1966, and a finding of "no derogation" of park resources would be needed before NPS would grant the application. Following the NPS determination, any such application would then be sent to the Commission for review and action.

#### **EVALUATION**

Staff recommends that the preliminary and final site and building plans for the telecommunications antennas be approved. The location and siting of the monoploes at the FTC and the Maintenance Yard will be compatible with the existing developed character of these areas.

At the maintenance yard BAM initially proposed that the monopole be 150 feet high, however the National Park Service determined that derogation of park resources would result from a structure of this height due to its visibility from the Taft Bridge and other locations, and is therefore limiting the height at this location to 130 feet.

As proposed, placing the antennas at the FTC site and in the upper terrace area of the maintenance yard will be acceptable because those areas of the park are currently developed. These developed areas of the park will not be adversely affected by the visibility of the monopoles and infrastructure. However, it is important to note that most of the areas of the park are retained in a more natural undisturbed condition and telecommunication facilities would not be able to be placed there without the certain derogation of park resources.

In response to the Commission's requests, NPS has submitted additional information regarding safety in the park and the review of future applications for wireless telecommunication facilities. Staff concurs with the NPS position that improved wireless communication in the park will allow faster access to emergency law enforcement and medical services personnel than currently exists. All of the alternatives identified by NPS would cause greater disturbance to park resources, and are themselves limited in service area.

Rather than try to estimate what facilities may be desired in the future by wireless telecommunication carriers, NPS has instead provided a detailed explanation of its policy for implementing the Telecommunications Act of 1996. The goal of "no derogation" to park resources is clear. In support of this goal, site characteristics and siting criteria have been established which will be applied to all future applications.

Finally, consistent with the Commission's antenna guidelines, the approval should be limited to a five-year period. Several months prior to the expiration of this five-year period NPS should apply to the Commission for a renewal or begin preparations to remove the facilities.

# **COORDINATION**

### Coordinating Committee

The Coordinating Committee reviewed this item and on March 18, 1999, and forwarded the proposal to the Commission with the statement that the project has been coordinated with all participating agencies. The participating agencies were NCPC; the District of Columbia Office of Planning; the Fire Department; the Department of Housing and Community Development; the

Department of Public Works; the General Services Administration; the National Park Service; and the Washington Metropolitan Area Transit Authority.

### **CONFORMANCE**

# Comprehensive Plan

The proposed monopoles and antennas would be located in Rock Creek Park, which is designated as a Natural Park in the Parks, Open Space and Natural Features Element of the Comprehensive Plan. Applicable policies in this element that relate to the protection of this park specify:

- Natural Parks...should be established, protected, and maintained to insure the conservation and enhancement of the significant Natural Features of the National Capital.
- Rock Creek Park and its tributary parks in the District and Montgomery County should
  continue to serve as important Natural Parks, retaining existing topography, indigenous
  plant materials and other natural conditions providing Open Space amenities for
  residents and visitors...The borders of the park should receive special protection from
  adjacent development which could cause erosion or adverse visual impacts.

Rock Creek is also a national landmark property and is located within a Historic District. Sixteenth Street, NW, which parallels the park on its east side, is a designated Special Street. Policies in the Preservation and Historic Features Element of the Comprehensive Plan that apply to the preservation of historic properties and the protection and enhancement of Special Streets state:

- New construction on Historic Landmarks or in Historic Districts should be compatible
  with the historical character and cultural heritage of the landmark or district. In design,
  height, proportion, mass, configuration, building materials, texture, color and location,
  new construction should complement these valuable features of the landmark or
  district, particularly features in the immediate vicinity to which the new construction
  will be visually related.
- Special Streets and Places should be maintained and enhanced in a manner that promotes their roles as major features that help establish the images and the symbols of the National Capital in the minds of its residents and visitors.

Preferred Alternative #3 at the FTC and Preferred Alternative #2 at the Maintenance Yard would be located to limit the impacts of the proposed antennas on park operations. They would also minimize visual impacts from the antennas within the park as well as on the Washington skyline

as observed from outside the park. The two preferred alternatives would provide sufficient mitigation to assure protection of the park's integrity.

### National Historic Preservation Act

The Rock Creek Park Historic District was listed in the National Register of Historic Places in 1991. The park is appreciated and visible to the public from ground level within the Park, as well as from elevated points at the edge of the park and from the bridges that cross the Rock Creek valley above the Park. Views from the bridges above the tree canopy are important to the public's understanding of this resource. Some parts of the park have been identified by NPS as not contributing to the historic character or significance of the park because of relatively recent construction at ground level.

NPS has determined that the proposed project will have no effect on the Rock Creek Park Historic District. On August 3, 1999, the District of Columbia State Historic Preservation Officer found that the antennas would have *no adverse effect* either from the historic viewsheds of the park or on archaeological resources. NPS has concluded its responsibilities under Section 106 of the National Historic Preservation Act.

# National Environmental Policy Act

Pursuant to the National Environmental Policy Act (NEPA), NPS has developed an Environmental Assessment (EA) for the proposed preliminary and final site and building plans for the wireless telecommunications facilities. The Park Service issued a Finding of No Significant Impact on the proposed action on April 7, 1999.

- The EA analyzed two alternatives for locating a wireless telecommunications facility at the FTC and four alternatives for a facility at the park's maintenance yard. The document examined their physical and visual impacts on park resources, operations and visitor services, including mitigation of any potential impacts. The EA also evaluated the no action alternative at both locations.
- Bell Atlantic Mobile has certified that its facilities would meet the Federal Communications
  Commission standards for radio-frequency exposure, that the facilities would not interfere
  with police radio communications, and that the cellular radio installations would not
  constitute a health hazard.
- No significant environmental effects are anticipated as a result of implementation of the facilities at the two proposed locations.
  - Replacement of the southwest light pole on the south practice courts at the tennis center with a 100-foot monopole will result in no significant effects on park resources.

- The unacceptable impacts of the proposed 150-foot monopole at the maintenance yard can be mitigated to an acceptable level by limiting its height at the upper maintenance yard terrace to 130 feet.